

**Oral Testimony of David P. Littell
Commissioner, Maine Department of Environmental Protection
on behalf of NESCAUM
on U.S. Environmental Protection Agency's Proposed Rule on the National Ambient
Air Quality Standards for Particulate Matter
(71 FR 2620-2708)
March 8, 2006
Philadelphia, Pennsylvania**

My name is David Littell and I am Commissioner of the Maine Department of Environmental Protection. I am speaking on behalf of NESCAUM -- the eight Northeast states -- on EPA's proposal to revise the primary National Ambient Air Quality Standards for fine particulate matter (or PM_{2.5} NAAQS).

Ambient fine particles pose a substantial air pollution-related risk to our society. They are ubiquitous, toxic, and detrimental to public health. Scientists have clearly established causal associations between fine particles and the aggravation of respiratory conditions such as asthma, cardiac conditions such as heart disease, and premature mortality. It has not been determined whether a threshold level exists below which health effects are undetectable.

Maine and the rest of the NESCAUM states agree with the findings of EPA staff and the Clean Air Scientific Advisory Committee (CASAC) that more stringent PM_{2.5} standards are required.

The scientific evidence accumulated over the last decade shows that significant health effects occur from exposure to ambient PM_{2.5} concentrations at levels at or below current federal standards. We are concerned, however, that EPA has proposed PM_{2.5} primary standards that differ from and are less stringent than EPA staff and CASAC recommendations.

EPA proposes to leave the annual standard unchanged at 15µg/m³ and tighten the 24-hour standard to 35µg/m³. Based on the preponderance of evidence, including an analysis of health effects studies and regional demographic and monitoring data, the NESCAUM states believe that an annual standard of 12µg/m³ and a 24-hour standard of 30µg/m³ (98th percentile form) are necessary to protect public health across the Northeast region and the U.S. This combination would lower PM_{2.5} concentrations to levels that regulatory agencies, including EPA's staff, conclude are required to protect public health based on the best available science.

NESCAUM's proposal has important consequences for the Northeast states. Based on recently monitored values, eighty-four percent of the NESCAUM region's population would directly benefit from improved air quality through nonattainment designations because local, regional, and national programs to reduce emissions will subsequently be implemented. Upwards of 50% of northeasterners are susceptible to PM_{2.5}, including children, the elderly, and those with preexisting heart and lung disease.

Over 70% of the total population (about 30 million people) live in areas that experience the region's highest air pollution levels. While the NESCAUM states recognize the implications of promoting standards that will place the majority of the region into nonattainment, we believe this is the appropriate public health action because of the corrective actions that will follow.

Elevated levels of particulate matter from local sources and transported from upwind can be found across broad areas of the Northeast, especially in its densely populated urban areas. The NESCAUM states are taking action to reduce local PM emissions beyond the requirements of the Clean Air Act, but unless EPA revises the standards to adequately protective levels, adverse health effects from exposure to concentrations near or below current standards will remain a serious public health concern, and our ability to lower these exposures will be significantly limited.

EPA's proposal for the primary PM_{2.5} NAAQS only takes us part way to truly protective standard-setting. For every one extra person EPA's less stringent proposal would protect in the Northeast, a more stringent 12/30 $\mu\text{g}/\text{m}^3$ set of standards could protect almost three additional people. This would amount to over 20 million more of our Northeast population receiving public health protection than under EPA's proposal. Across the U.S. a combination of 12 and 30 $\mu\text{g}/\text{m}^3$ annual and 24-hour standards would lead to 100% more protection, or double the number of people protected from exposure to fine particulate matter.

Clearly, EPA should follow – not ignore – the advice of our nation's leading scientists and embrace the opportunity to protect public health as envisioned by the framers of the Clean Air Act.

The NESCAUM states will be submitting more detailed comments into the docket.

Thank you for the opportunity to testify.